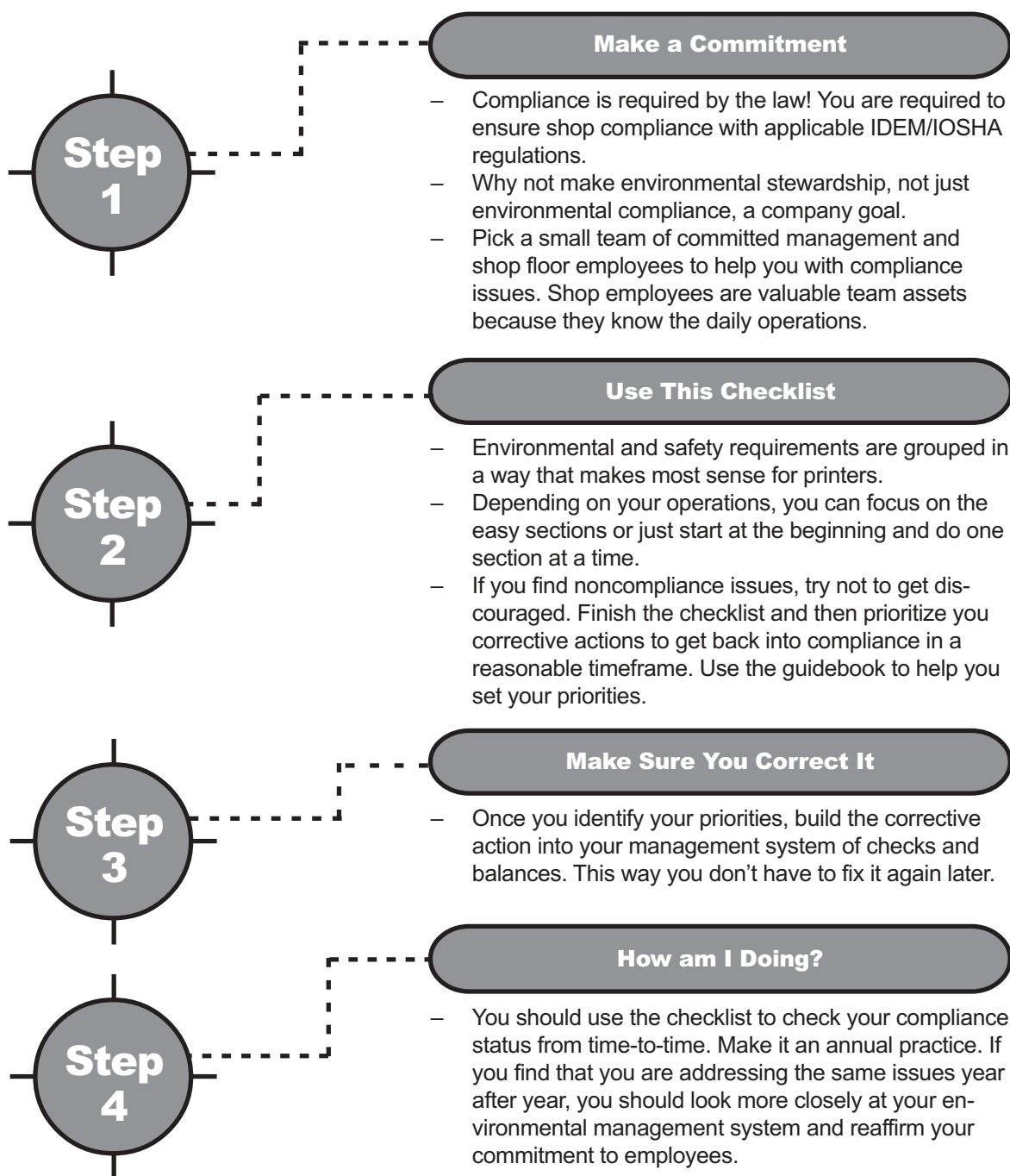


Printers Checklist

Printers often say, if you explain the regulations to us in plain English, we'll comply. This guidebook takes regulations, some of which are very complicated, and translates them into simpler terms. Now printers have an opportunity to evaluate their own shops using a checklist based on this guidebook. To gain the biggest benefit, follow these steps.







Printer's Checklist



Check off each item when completed.

Air Quality

- ☐ Have you taken an inventory of emission sources?
- ☐ Have you calculated your Potential to Emit (PTE) VOC Emissions to determine the need to register IDEM or obtain an Operating Permit?
- ☐ Do you monitor your blanket and roller wash purchases to look for ways to reduce their use?
- ☐ Do you keep all containers of inks, coatings, adhesives, washes and fountain solutions closed when not in use?
- ☐ If you have pollution control equipment, have you determined whether an operating permit is required for that equipment?
- ☐ Have you determined whether you can meet annual fuel restrictions or get a Source Specific Operating Agreement or Operating Permit for your fuel combustion equipment?
- ☐ Have you evaluated the need to get an Operating Permit for emissions from your dust generating/filtration equipment?
- ☐ Have you determined whether Part 70 Operating Permits are required? Can you implement P2 to downgrade to an Operating Permit?
- ☐ Do you use significant quantities of Hazardous Air Pollutants? If so, have you determined the need for an operating permit?
- ☐ Do you use or store more than 10,000 lbs of flammable substances for a single process? If so, have you prepared a Risk Management Plan?
- ☐ Have you looked for ways to reduce blanket and roller wash including diluting them with water before application? 
- ☐ Do you keep containers of inks, solvents, fountain solutions and soiled shop towels closed? 
- ☐ Do you use VOC blanket and roller washes that have a low vapor pressure of less than 10 mm Hg. 
- ☐ Do you avoid solvents, coatings and adhesives containing Hazardous Air Pollutants like methylene chloride & toluene? 

☐

Do you use alcohol-substitutes in the fountain solution?



Land Quality

Hazardous Waste

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Have you evaluated your wastes to determine if they are hazardous?

☐

Do you have Waste Profile Sheets for each hazardous waste and waste oil you generate? See page 22.

☐

Have you performed a monthly hazardous waste inventory to determine your generator status? If so, what is it? CESQG ____ SQG ____ LQG ____

☐

Have you obtained an EPA ID Number if you are a SQG or LQG?

☐

Do you use USDOT-approved containers for waste accumulation and shipment?

☐

Do you label all containers of hazardous waste when you first start filling them?

☐

Does the label have the name of the waste and its primary hazards?

☐

If the containers are in a Satellite Accumulation Area, are the containers then dated and moved offsite or to a Hazardous Waste Storage Area within three days after they are full?

☐

Are all containers in the Hazardous Waste Storage Area labeled and dated? Do you ensure they do not exceed 180 days (SQGs) or 90 days (LQGs)?

☐

Does the Hazardous Waste Storage Area have a warning sign posted and have secondary containment? Is it inspected on a weekly basis?

☐

Are you segregating wastes to minimize regulatory requirements?

☐

Do you minimize the amount of solvent and ink on your soiled shop towels? Are they kept in closed containers? If they are saturated, do you drain or wring out the towels before sending them to a laundry?

☐




Do you use a licensed transporter for hazardous waste shipments?

☐


Do you keep on file two manifest copies and the Landfill Disposal Restriction Form for each waste shipment? For routine shipments under a tolling agreement, do you keep the Bills of Lading? Are all shipping papers kept at least three years?

☐

Do you or your transporter send the appropriate manifest copies to the state receiving the hazardous waste?

- ☐ If you are a SQG and LQG, have you prepared for an emergency by designating an Emergency Coordinator; posting emergency phone numbers; providing spill control equipment; training employees and having sufficient fire fighting equipment available?
- ☐ If you are a LQG, do you have a written Training Plan and Contingency Plan? Do you keep training records for annual employee training?
- ☐ Do you use squirt bottles to wash blankets and rollers, instead of open buckets to reduce waste solvent? 
- ☐ Do you generate enough waste solvent to purchase a solvent recovery unit? 
- ☐ Do you wring out saturated shop towels to reduce solvent going to laundry? 

Waste Oil

- ☐ Is your waste oil sent offsite for recycling or energy recovery?
- ☐ Are the containers labeled as “Used Oil” or “Waste Oil”?
- ☐ Are the containers in good condition and kept closed?
- ☐ Are oil-saturated materials and wastes contained for offsite disposal?
- ☐ Do you use a licensed transporter to handle your waste oil, oily wastewater and oily debris?
- ☐ Do you ensure that only unsaturated oily shop towels are sent to the laundry?
- ☐ Do you generate enough waste press oil to purchase a portable oil filtration unit and reclaim the oil? 

Universal Wastes

- ☐ Do you generate waste Ni-Cad, small lead-acid batteries? If so, do you collect them for recycling in containers marked as “Waste Batteries”, “Used Batteries”, or “Universal Waste Batteries”?
- ☐ Do you generate large lead-acid batteries (for example, forklift batteries)? If so, are they sent for reclamation? If not, are they disposed of as hazardous waste?
- ☐ Do you generate used fluorescent or mercury-vapor lamps? If so, do you collect them for recycling in containers marked as “Waste Mercury-Containing Lamps”, “Used Mercury-Containing Lamps”, or “Universal Mercury-Containing Lamps”?






- ☐ Do you limit universal waste accumulation to less than one year?
- ☐ Do you clean up leaking batteries or broken lamps and dispose of them as hazardous waste?
- ☐ Do you use licensed reclamation facilities to accept the universal wastes?
- ☐ Do you train your employees on the proper handling of universal wastes?
- ☐ If you are a LQH, do you keep records on universal waste shipments?

Discarded Electronics

- ☐ Do you evaluate all obsolete electronics equipment feasible for reuse?
- ☐ If you cannot reuse or donate the equipment, do you send it to a reclamation facility?
- ☐ If the equipment cannot be reclaimed, do you determine which components are hazardous and collect them for proper hazardous waste disposal?

Water Quality

- ☐ Do you discharge to a septic system? If so, do you have an IDEM permit to discharge to the groundwater?
- ☐ Do you discharge industrial wastewater to a municipal sewer? If so, do you have a discharge permit from the local sewer authority or IDEM?
- ☐ Do you discharge industrial wastewater to a surface water body? Can you modify your operations to discontinue the discharge? If not, do you have an NPDES permit from IDEM?
- ☐ Do you meet the discharge limits on your permit, perform the required testing, and submit results for your industrial wastewater permits (NPDES, industrial discharge to the sewer, stormwater, groundwater discharge)?
- ☐ Do you meet the general pretreatment standards found on page 46?
- ☐ Do you have Silver Recovery Units (SRUs) to pretreat silver-bearing wastewater before discharging to the sewer or septic system?
- ☐ Do you have the proper number of silver canisters for low volume discharges or an electrolytic SRU followed by the proper number of canisters to ensure efficient silver recovery?
- ☐ Are the SRUs maintained and serviced according to manufacturer specifications?

- ☐ Do you test the SRU discharge for silver to ensure it is working properly?
- ☐ Are you required to submit wastewater surveys periodically? If so, do you keep copies on file. If you change or add new processes have you notified your local sewer authority or IDEM to determine if your permit should be modified?
- ☐ Do you use chromium-free system cleaners or bleach for cleaning film processors? 
- ☐ Do you periodically tune your film processor to manufacturer specifications to minimize bath overflow? Do you adjust the squeegees to minimize carryover? 
- ☐ Do you use recirculators for developer, fixer and rinsewater to lower water use and discharge volume? 
- ☐ Have you evaluated silver-free films, subtractive plate developers, or aqueous proof developers? 
- ☐ Do you minimize fountain solution dumps by running the solution in the tank as low as possible? Do you cover the holding tank to prevent dust contamination? Do you filter the recirculating fountain solution to remove contaminants and extend the life of the solution? 

Stormwater

- ☐ Do you conduct any chemical/waste storage or handling activities outside your shop? If so, can you relocate them inside. If not, did you obtain a stormwater discharge permit from IDEM? Have you prepared a written Stormwater Pollution Prevention Plan?
- ☐ Have you implemented the Best Management Practices for reducing stormwater contamination found on page 52?
- ☐ If you do not have any outside material storage or handling activities did you send a “No Exposure Storm Water Certification” to IDEM.

Workplace Safety

Hazard Communication

- ☐ Do you have a written Hazard Communication Plan?
- ☐ Do you label all containers, reservoirs and tanks with the product name, primary hazards (flammable, corrosive, etc.) and the target organs (eyes, skin, lungs, nervous system, etc.).
- ☐ Do you keep Material Safety Data Sheets (MSDSs) for all chemicals in your shop. (Even if you stop using the product, you must keep the MSDS for 30 years and document its period of use.)
- ☐ Do you keep a Chemical Product List (a list of MSDSs on file) with the written HazCom Plan? Do you update it at least annually?
- ☐ Do you train your employees and document the training?

Lockout/Tagout

- ☐ Do you have a written Lockout/Tagout Plan?
- ☐ Do you keep an equipment inventory subject to lockout? Are the lockout sources and procedures described?
- ☐ Do you provide locks and tags for lockout? Is there only one key for each lock?
- ☐ Are employees authorized to perform lockout trained in the procedures specific to the equipment for which they are responsible? Are employees not authorized (also known as affected employees) trained in how the locks/tags are used and not to attempt to restart locked/tagged equipment?
- ☐ Do you perform an annual review and certification of the lockout plan and review the procedures with each authorized employee? Do you document this effort?

Machine Guards

- ☐ Do you guard all ingoing nip points, slitters, guillotine cutters, rotating gears, and any other point of operation where an employee can get caught or cut?
- ☐ Do you have guards installed on older equipment even though they may not have come with guards?

☐

Do bench grinders have wheel guards, safety shields, and tool rests? The tool rests must be within 1/8 inch of the grinding wheel.

Power Transmission

☐

Do you guard all rotating gears, pulleys, belt/chain drives and drive shafts below seven feet? It is strongly recommended that power transmission equipment be guarded to a height where employees cannot reach it.

Personal Protective Equipment

☐

Did you conduct a Personal Protective Equipment (PPE) Hazard Assessment for each department? Document and sign the Hazard Assessment. Do you update the Hazard Assessment when operations or PPE needs change?

☐

Do you provide PPE?

☐

Do you conduct and document employee training in PPE use and care.

☐

Do you ensure that employees wear and take care of PPE?

Flammable & Combustible Liquids

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Do you use approved, closable containers for flammable/combustible liquid storage?

☐

Do you store welding gases, inks and solvents away from ignition sources, such as electrical panels, and high voltage equipment?

☐

If you use liquids with a flash point of 100°F or less, are they properly grounded?

Fire Extinguishers

☐

Do you have fire extinguishers within 25 feet of flammable/combustible storage areas and 75 feet for other nonproduction areas?

☐

Do you ensure that fire extinguishers are certified usable and tagged every 12 months?

☐

Do you ensure access to fire extinguishers, fire hoses, and alarms? Do you conduct monthly inspections?

☐

Are employees authorized to use fire extinguishers trained annually? Do you document the training?

Means of Egress

- ☐ Do you ensure that exit doors are not locked?
- ☐ Are non-exit doors marked "Not an Exit" or the name of the room?
- ☐ Are aisles leading to exit doors clear and at least 36 in. wide?
- ☐ Do you ensure that exit signs and emergency lights are working?

Electrical System Design

- ☐ Do you ensure all live electrical components in electrical panels are covered with noncombustible materials?
- ☐ Do you keep electrical panels clear with a three foot buffer zone? For panels over 600 volts, use a four feet buffer zone.

Electrical Wiring & Equipment

- ☐ Do you ensure that all power cords are insulated?
- ☐ Do you use electrical tape to repair torn wires? Are you replacing or shortening damaged wires?
- ☐ Do you ensure that equipment with metal enclosures are properly grounded?
- ☐ Do you ensure that all portable lamps, vending machines and refrigerators are also grounded?
- ☐ Do you ensure that lamp fixtures below eight feet do not have exposed electrical components?
- ☐ Do you mark equipment disconnects, panels and breakers as to their purpose?
- ☐ Do you have any broken or missing outlet faceplates?

Miscellaneous

- ☐ Do employees use safety glasses when cleaning with compressed air over 30 psi? Are nozzle tips designed to prevent back pressure buildup if the nozzle clogs?
- ☐ Do you ensure that storage mezzanines have top rails, mid rails and toeboards? Are they posted with a floor loading sign (e.g., 150 lbs/ft² maximum load)?

- ☐ Do you keep the OSHA 300 log current within six days of the last recordable injury? Do you post it during the months of February, March and April? Do you keep the logs for at least five years? The OSHA 300 log is not required for print shops with 10 or fewer employees.
- ☐ Have you conducted a noise survey to determine if you are required to have a mandatory Hearing Conservation Program? The action level is 85 dBA over 8 hours or 50% of dose level.
- ☐ If a Hearing Conservation Program is required, do you document annual hearing tests offered to employees ?
- ☐ Do you conduct and document annual hearing conservation training for employees exposed to noise in excess of the 85 dB threshold?
- ☐ If you have noise levels that exceed 90 dBA over 8 hours, have you installed engineering controls or provide, two types of hearing protection?
- ☐ Do you post hearing protection signs and the OSHA noise rule in the area where hearing protection is required?
- ☐ Is the OSHA Safety & Health Protection on the Job notice posted where employees can see it?

Fire Safety

- ☐ Do you have a written Emergency Action Plan and Fire Prevention Plan? Is it reviewed at least annually to ensure that it is up-to-date? (If you have less than 10 employees, a written plan is not required and you can verbally communicate the procedures to your employees.)
- ☐ If you have more than 10 employees, have you provide basic training on procedures in the Emergency Action Plan and Fire Prevention Plan?
- ☐ Do you post emergency phone numbers around the shop or near telephones?
- ☐ Do you have a method of alerting employees in an emergency? Can you use a phone intercom or fire alarm system?
- ☐ Do you always use approved (USDOT, UL, NFPA, etc.) containers for the storage of flammable and combustible liquids? Are they labeled with HazCom information.
- ☐ Do you ensure that flammable/combustible liquids are not stored near electrical panels, press controls, outlets, light switches, bench grinders, etc.?

- ☐ Are parts washers installed with proper wiring and away from electrical panels?
Are washer covers closed when not in use? Are fusible links required by the supplier?
- ☐ Are containers that receive flammable liquids grounded when dispensing?
- ☐ Do you perform immediate spill cleanup and general housekeeping for flammable/combustible liquids?
- ☐ Do you keep all containers closed when not in use?
- ☐ If you store soiled shop towels in small safety cans near the press, do you empty them daily? Are soiled shop towels stored in labeled 55 gallon steel drums until pickup?
- ☐ Do you keep only enough flammable or combustible liquids in your work area to do the job?
- ☐ Do you store flammable and combustible liquids in fire safety cabinets?
- ☐ Do you store more than the liquid quantities outside a fire safety cabinet, chemical storage room or designated fire area?
- ☐ Do you isolate flammable and combustible materials away from welding and other hot work?
- ☐ Do you provide adequate ventilation for work and storage areas?
- ☐ Do you provide employees with awareness training on the proper handling and storage of flammable and combustible liquids?
- ☐ Do you promote employee suggestions on better housekeeping, improved handling, and using smaller quantities of flammable/combustible liquids?
- ☐ Do you have a notification procedure for reporting spills and leaks for quick cleanup?
- ☐ Do your employees understand their responsibilities when a fire is discovered and the fire alarm sounds?

Community Right to Know

- ☐ Do you exceed the Threshold Planning Quantities (TPQs) for listed hazardous chemicals? If so, have you notified the Indiana Emergency response Commission (IERC) and Local Emergency Planning Committee (LEPC)? See page 72 for specific TPQs.



Do you file a Tier Two Report by March 1 each year. Do you mail it to the IERC and the LEPC? Do you keep copies of the report for at least five years.



Do you use over 10,000 lbs or process over 25,000 lbs of any EPA listed chemicals? If so, do you submit the Form R annual report by July 1?



If you file the Tier Two Report or Form R do you also submit the HC-500 form and annual fee in February each year?

Spill Reporting



Do your employees know that all spills outside the building should be reported to a shop manager or owner?



Do shop managers know that a reportable spill must be reported to IDEM, and possibly the NRC, within two hours of discovery?



Do you keep a copy of the tables of hazardous substances and their reportable quantities for reference?



Do shop managers also know that under certain circumstances, the USDOT and IOSHA must also be notified?